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Attorneys for Debtors and Reorganized Debtors

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

- and -

PACIFIC GAS AND ELECTRIC COMPANY,

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

** All papers shall be filed in the Lead Case, No. 19-30088 (DM).*

Bankruptcy Case No. 19-30088 (DM)

Chapter 11

(Lead Case) (Jointly Administered)

**REORGANIZED DEBTORS' REPORT
ON RESOLUTION OF THIRTEENTH
SECURITIES CLAIMS OMNIBUS
OBJECTION (CLAIMS BARRED BY THE
STATUTE OF REPOSE) WITH RESPECT
TO CERTAIN CLAIMS**

[Re: Dkt. Nos. 11085, 11302]

**Regarding Objection Set for Hearing
November 9, 2021, at 10:00 a.m. (Pacific
Time)**

REPORT ON RESOLUTION OF CERTAIN CLAIMS

In advance of the November 9, 2021, 10:00 a.m. omnibus hearing (the “**Hearing**”), PG&E Corporation (“**PG&E Corp.**”) and Pacific Gas and Electric Company (the “**Utility**”), as debtors and reorganized debtors (collectively, the “**Debtors**” or the “**Reorganized Debtors**”) in the above-captioned chapter 11 cases (the “**Chapter 11 Cases**”) hereby report on the resolution of certain Claims in the following securities claims omnibus objection:

Docket No.	Omnibus Objection
11085	<i>Reorganized Debtors’ Thirteenth Securities Claims Omnibus Objection (Claims Barred by the Statute of Repose)</i> (the “ Thirteenth Securities Claims Omnibus Objection ”)

Docket No.	Claimant	Claim Nos.	Resolution
Thirteenth Securities Claims Omnibus Objection			
11260	AmeriTrust Claimants	107040, 107038, 107039, 104331	The Thirteenth Securities Claims Omnibus Objection has been WITHDRAWN without prejudice with respect to these Claims.
11277	Commonwealth Annuity and Life Insurance Company	100939	The Thirteenth Securities Claims Omnibus Objection has been WITHDRAWN without prejudice with respect to this Claim.
Informal	William Mayer	98261	The Thirteenth Securities Claims Omnibus Objection has been WITHDRAWN without prejudice with respect to this Claim.

Docket No.	Claimant	Claim Nos.	Resolution
Informal	Larry & Paulette Siedow	97946	The Thirteenth Securities Claims Omnibus Objection has been WITHDRAWN without prejudice with respect to this Claim.
Informal	Donald S. Terra	98875	The Thirteenth Securities Claims Omnibus Objection has been WITHDRAWN without prejudice with respect to this Claim.

With respect to each of the proofs of claim set forth above (the “**Proofs of Claim**”), the Thirteenth Securities Claims Omnibus Objection objected thereto on the basis that the applicable statute of repose barred claims arising under Section 11 of the Securities Act of 1933 (the “**Securities Act Claims**”). Each of the above claimants responded to the Thirteenth Securities Claims Omnibus Objection, either formally or informally, and arguably purport to assert claims other than Securities Act Claims. They did not deny that the statute of repose was applicable to, and barred, their Securities Act Claims.

Rather than proceeding to seek to expunge only the Securities Act Claims and leave the Proofs of Claim partially denied and partially unresolved at this time, the Reorganized Debtors have withdrawn the Thirteenth Securities Claims Omnibus Objection, without prejudice, with respect to the Proofs of Claim. The Reorganized Debtors currently intend to object to each of the Proofs of Claim. The Reorganized Debtors reserve the right to object to the Proofs of Claim on any basis, including but not limited to that the applicable statute of repose bars some or all of the claims asserted in the Proofs of Claim.

Dated: October 12, 2021

WEIL, GOTSHAL & MANGES LLP

KELLER BENVENUTTI KIM LLP

By: /s/ Richard W. Slack

Richard W. Slack

Attorneys for Debtors and Reorganized Debtors